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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)	
)	
National Exchange Carrier Association, Inc.)	CC Docket No. 99-316
Petition to Amend Section 69.3 of the)	RM 9486
Commission's Rules)	

COMMENTS
OF THE
NATIONAL TELEPHONE COOPERATIVE ASSOCIATION

The National Telephone Cooperative Association ("NTCA") submits these Comments in support of the request of the National Exchange Carrier Association ("NECA") to amend certain Part 69 rules so as to shorten the current required period for changes in participation in NECA's access tariffs.

NTCA is a national association of approximately 500 local exchange carriers that provide service primarily in rural areas in forty-six states. All NTCA members are small carriers that are "rural telephone companies" as defined in the Telecommunications Act of 1996. NTCA members participate extensively in the NECA pools.

The proposal to change the tariff election deadline from December 31 of the preceding year to March 1 of the tariff year makes sense given the current state of the industry and other changes made to the Commission's rules. The December 31 deadline was adopted at a time when the telecommunications industry was relatively stable and NECA's internal processes were less

National Telephone Cooperative Association
November 22, 1999

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mechanized than they are today. Also, carriers were required file annual access tariff revisions on at least 90 days' notice, rather than the current 15 days¹. A change in the election date is a logical response to these other influences.

Adoption of the proposed change to move the election deadline to March 1 of the tariff year would benefit NTCA members and others eligible to participate in NECA pools. It would give them more time to analyze pertinent data and decide whether or not to participate in NECA's interstate access tariffs and revenue pools. It would also permit them to make the decision with the benefit of information ascertained during the months of January and February. Two months is a significant length of time given the rapid changes taking place in the telecommunications industry and regulatory uncertainties concerning the on-going implementation of the 1996 Act. A change in the date will afford companies the opportunity to perform a more thorough analysis, using additional information to decide issues which will affect their revenues for the next 12 months. Companies should not have to make a decision about participation any sooner than what is necessary to permit NECA to prepare and file interstate access rates that accurately reflect the cost and demand characteristics of its pooling companies.

NECA indicated that it no longer needs six months advance notice of participation to prepare the tariff.² Since NECA is in the best position to determine when it needs information, the Commission should accept its judgment in this matter and adopt the proposed change to the rule.

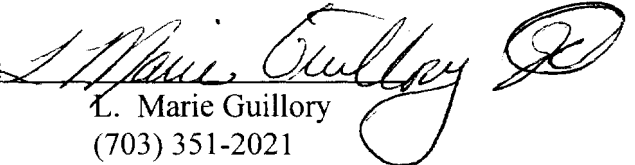
¹47 C.F.R. § 61.58(e).

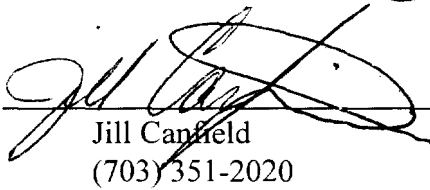
²NECA petition, p.2

For the reasons set forth above, NTCA supports the proposed rule change.

Respectfully submitted,

NATIONAL TELEPHONE COOPERATIVE
ASSOCIATION

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November 22, 1999

CERTIFICATE OF SERVICE

I, Gail C. Malloy, certify that a copy of the foregoing Comments of the National Telephone Cooperative Association in CC Docket No. 99-316, RM - 9486 was served on this 22nd day of November 1999 by first-class, U.S. Mail, postage prepaid, to the following persons on the attached list:


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